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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

LORENA GODINEZ,

Plaintiff,

vs.

**BMW OF NORTH AMERICA, LLC, a
Delaware Limited Liability Company,
and DOES 1 through 10, inclusive,**

Defendants.

Case No.: 2:17-cv-5072-ODW-RAO

JOINT EXHIBIT LIST

Plaintiff LORENA GODINEZ and Defendant BMW OF NORTH AMERICA, LLC, by and through counsel, hereby submit the following exhibit list for the trial in the above-entitled action. The parties reserve the right to introduce exhibits designated and/or listed and/or offered by any party to this action, and hereby reserve the right to object to the admissibility of any exhibits designated, listed, and/or offered by any other party to this action. The parties further reserve the right to introduce exhibits for the purpose of impeachment, rebuttal, or rehabilitation and reserves the right to introduce additional exhibits upon appropriate notice to all parties. The Parties further hereby reserve the right to introduce additional exhibits as necessary, including, but not limited to any and all exhibits marked and attached to the depositions of any fact or expert witness taken in this action. The Parties further reserve the right to augment this Exhibit List following the conferencing with one another's counsel that is required pursuant to local rules.

PLAINTIFF'S EXHIBITS

Exhibit No.	Description	Date Identified	Date Admitted
1.	Retail Installment Sale Contract dated 12/31/09		
2.	McKenna BMW Repair Order No. 162832 dated 12/18/09 (GODINEZ000220-223)		
3.	McKenna BMW Repair Order No. 162949 dated 12/21/09 (GODINEZ000070-76)		
4.	McKenna BMW Repair Order No. 178380 dated 10/11/10 (GODINEZ000224-33) (Lorena Godinez vs. BMWNA 30)		

Exhibit No.	Description	Date Identified	Date Admitted
5.	McKenna BMW Repair Order No. 184358 dated 1/24/11 (GODINEZ000234-44) (Lorena Godinez vs. BMWNA 28-29)		
6.	McKenna BMW Repair Order No. 195979 dated 9/9/11 (GODINEZ000245-56) (Lorena Godinez vs. BMWNA 26-27)		
7.	McKenna BMW Repair Order No. 202850 dated 1/16/12 (GODINEZ000126-30) (GODINEZ000257-70) (Lorena Godinez vs. BMWNA 24-25)		
8.	McKenna BMW Repair Order No. 212135 dated 7/9/12 (GODINEZ000131-36) (GODINEZ000272-83) (Lorena Godinez vs. BMWNA 22-23)		
9.	McKenna BMW Repair Order No. 218120 dated 10/31/12 (GODINEZ000137-52) (GODINEZ000284-308) (Lorena Godinez vs. BMWNA 18-21)		
10.	McKenna BMW Repair Order No. 221071 dated 12/31/12 (GODINEZ000153-56) (GODINEZ000309-319) (Lorena Godinez vs. BMWNA 17)		

Exhibit No.	Description	Date Identified	Date Admitted
11.	McKenna BMW Repair Order No. 223125 dated 2/11/13 (GODINEZ000157-162) (GODINEZ000320-32) (Lorena Godinez vs. BMWNA 15-16)		
12.	McKenna BMW Repair Order No. 224484 dated 3/11/13 (GODINEZ000163-66) (GODINEZ000333-44) (Lorena Godinez vs. BMWNA 14)		
13.	McKenna BMW Repair Order No. 232745 dated 8/8/13 (GODINEZ000167-77) (GODINEZ000345-62) (Lorena Godinez vs. BMWNA 11-13)		
14.	McKenna BMW Repair Order No. 233213 dated 8/17/13 (GODINEZ000178-84) (GODINEZ000363-69) (GODINEZ000370-82) (Lorena Godinez vs. BMWNA 9-10)		
15.	McKenna BMW Repair Order No. 239846 dated 12/27/13 (GODINEZ000185-94) (GODINEZ000383-401) (Lorena Godinez vs. BMWNA 6-8)		

Exhibit No.	Description	Date Identified	Date Admitted
16.	McKenna BMW Repair Order No. 240249 dated 1/4/14 (GODINEZ000195-96) (GODINEZ000402-12)		
17.	New Century BMW Repair Order No. 915264 dated 11/26/14 (GODINEZ000197-200) (GODINEZ000417-28)		
18.	New Century BMW Repair Order No. 944017 dated 10/24/15 (GODINEZ000429-33) (GODINEZ000435) (GODINEZ000437-57)		
19.	New Century BMW Repair Order No. 973019 dated 9/26/16 (GODINEZ000210-12) (GODINEZ000459-62) (GODINEZ000471-501) (Lorena Godinez vs. BMWNA 32-37)		
20.	New Century BMW Repair Order No. 979975 dated 12/9/16 (GODINEZ000503-06) (GODINEZ000509-58)		
21.	New Century BMW Repair Order No. 1002966 dated 8/30/17 (Lorena Godinez vs. BMWNA 39-40)		
22.	New Century BMW Repair Order No. 1033915 dated 8/28/18 (Lorena Godinez vs. BMWNA 50-52)		

Exhibit No.	Description	Date Identified	Date Admitted
23.	New Century BMW Repair Order No. 1039168 dated 10/29/18 (Lorena Godinez vs. BMWNA 63-65)		
24.	New Century BMW Repair Order No. 1041238 dated 11/24/18 (Lorena Godinez vs. BMWNA 66-68)		
25.	New Century BMW Repair Order No. 1041240 dated 11/24/18 (Lorena Godinez vs. BMWNA 69-71)		
26.	New Century BMW Repair Order No. 1044752 dated 1/7/19 (Lorena Godinez vs. BMWNA 72-73)		
27.	American Tire Depot Invoice dated 10/8/16 (Lorena Godinez vs. BMWNA 41)		
28.	American Tire Depot Invoice dated 12/22/17 (Lorena Godinez vs. BMWNA 42-43)		
29.	American Tire Depot Invoice dated 7/27/18 (Lorena Godinez vs. BMWNA 53-54)		
30.	Purchase Documents (GODINEZ000065-69)		
31.	DMV Documents (Lorena Godinez vs. BMWNA 3-4, 58)		
32.	Insurance Documents (Lorena Godinez vs. BMWNA 5, 59-62)		
33.	Letter from BMW Financial Services to Plaintiff dated March 20, 2018 (Exhibit 3 Plaintiff's Depo)		

Exhibit No.	Description	Date Identified	Date Admitted
34.	Email from BMW to Plaintiff RE: Plaintiff's Repurchase Request dated 11/10/16 (Lorena Godinez v. BMWNA 56-57)		
35.	Internal BMW Email RE: Plaintiff's Repurchase Request dated 11/10/16 (GODINEZ000219)		
36.	Service History Recap through 9/26/16 (GODINEZ000119-20)		
37.	Warranty Vehicle Inquiry dated 11/10/16 (GODINEZ000215-18)		
38.	Warranty Claim Details dated 11/11/16 (GODINEZ000121-125)		
39.	Warranty Vehicle Inquiry dated 4/26/17 (GODINEZ000087-118)		
40.	Warranty Vehicle Inquiry dated 8/6/18 (Holguin Expert File)		
41.	Service Request Detail S01028802381 dated 10/15/10 (GODINEZ000077-78)		
42.	Service Request Detail S01219805190 dated 7/16/12 (GODINEZ000079-80)		
43.	Service Request Detail 201631205281 dated 11/23/16 (GODINEZ000081-86)		

Exhibit No.	Description	Date Identified	Date Admitted
44.	SI B 63 06 10 – LEDs in Rear Lamp Inoperative (GODINEZ000593)		
45.	SI B 61 02 13 – Recall Campaign 13v-044: Repair Battery Positive Cable; Attachment for Repair Battery Positive Cable (GODINEZ000564-76, 589-92)		
46.	SI B 61 02 13 – Customer Letter RE: Recall Campaign 13v-044: Repair Battery Positive Cable (GODINEZ000561-63)		
47.	SI B 61 02 13 – Q&A RE: Recall Campaign 13v-044: Repair Battery Positive Cable (GODINEZ000577-79)		
48.	SI B 12 18 14 – Engine Misfire Due to Failed Ignition Coil (GODINEZ000586-88)		
49.	SI B 01 20 16 – Footwell Module: Limited Warranty Extension to 8 Years/125,000 Miles; Attachment for Footwell Module: Limited Warranty Extension to 8 Years/125,000 Miles (GODINEZ000559-60, 580-85)		
50.	SI B 11 16 17 – Recall 17V-683: Positive Crankcase Ventilation (PCV) Valve Heater; Repair Procedures for Positive Crankcase Ventilation (PCV) Valve Heater (Holguin Expert File)		

Exhibit No.	Description	Date Identified	Date Admitted
51.	SI B 64 07 17 – Recall 17V-676: Blower Motor Wiring; Repair Procedures for Short Repair Cable; Repair Procedures for Wire Harness Connector; Repair Procedures for Harness Checking Procedure (Holguin Expert File)		
52.	Service and Warranty Information Booklet – 2010 1 Series, 3 Series, 5 Series, 6 Series (GODINEZ000001-61)		
53.	BBB California Lemon Law Summary		
54.	Owner’s Manual for Vehicle – 328i, 328i xDrive, 335i, 335i xDrive, M3		
55.	Photographs of Vehicle (Lorena Godinez vs. BMWNA 46-49) (Exhibit 4 Plaintiff’s Depo)		
56.	German Imports Auto Inc. Invoice dated 6/25/18 (Lorena Godinez vs. BMWNA 55)		
57. – 999.	<i>Reserved</i>		

DEFENDANT'S EXHIBITS

Exhibit No.	Description	Date Identified	Date Admitted
1000.	Vehicle Repair Timelines		
1001.	Complaint dated 4/18/17		
1002.	Vehicle Warranty History		
1003.	BMW BBB Arbitration Certification Program		
1004.	Certificate of Certified Status		
1005.	BBB California Lemon Law Summary		
1006.	Carfax re subject vehicle		
1007.	Luis Holguin expert disclosure and expert report		
1008.	Relevant Portions of Service Manual for BMW 3 Series 2006-2010		
1009.	Diagram Re Oil Filter Housing Gasket and Gasket		
1010.	Diagram Re Drive Belt Pulley, Idler Pulley, and Power Steering Pump		
1011.	Diagram Re Coolant System		
1012.	Diagram Re Window Regulator		
1013.	Diagram Re Valve Cover and Exemplar Valve Cover Gasket		

Exhibit No.	Description	Date Identified	Date Admitted
1014.	Diagram Re O2 Sensor		
1015.	Foot Well Module Description		
1016.	Exemplar Tail Lamp LED Circuit Board		
1017.	Front Brake Caliper Diagram		
1018.	Gas Cap Photograph and Exemplar Gas Cap		
1019.	SIB 61 02 13 Re Battery Cable		
1020.	Ignition Coil Diagram		
1021.	Exemplar Valve Cover		
1022.	Customer Contact Log		
1023.	Email dated 12/19/16 to Jose Conde re additional vehicle repair with attached documents		
1024.	Email re Jose Conde's Response to 12/19/16 email		
1025.	<i>Reserved</i>		

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DATED: April 1, 2019

Respectfully Submitted,

WIRTZ LAW APC

By: /s/ Amy R. Rotman
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LORENA GODINEZ

DATED: April 1, 2019

LEHRMAN LAW GROUP

By: /s/ Daniel R. Villegas
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